

Exhibit 1

Johnson, et al. v. Gawker Media, LLC, et al.

Chart of Alleged Injurious Falsehoods and Libelous Statements and Relevant Defenses

	Paragraph in Complaint	Quote	Article	Failure to State a Claim
A.	66(a)(i)(1)	“The list of Johnson stories that have been proven wrong is long, but his greatest hits include . . . [e]rroneously reporting that former Newark mayor Cory Booker didn’t actually reside in Newark.”	December 9 Trotter Article	Opinion
B.	66(a)(i)(2)	“...Contributing reporting to the Daily Caller’s infamous story about New Jersey Senator Bob Menendez allegedly soliciting prostitutes in the Dominican Republic. The story turned out to be a complete fabrication, and may have been planted by the Cuban government.”	December 9 Trotter Article	Opinion
C.	66(a)(ii)	“Earlier this year [Johnson] collected screenshots of murdered teenager Michael Brown’s Instagram account. (Quoting Johnson), ‘Brown’s Instagram account also shows a violent streak that may help explain what led to a violent confrontation with Police officer Darren Wilson,’ Johnson wrote. In other words, Brown deserved to die.”	December 9 Trotter Article	Opinion
D.	66(b)(i)	“Rumor 1: Johnson shit on the floor in college”	December 15 Trotter Article	Not a Factual Representation
E.	66(b)(ii)(1)	“Hilariously, he graduated being best known for pooping on the (I think I’m remembering the floor right) 7 th floor of Stark (a dorm). I’m sad this idiot is getting any attention at all, but I hope this guy becomes famous for the same reasons he was in college, his public pooping problems”	December 15 Trotter Article	Section 230
F.	66(b)(ii)(2); 81(ii)(1)	“I started two years after him, so I wasn’t there since he did it as a freshman or sophomore. But the	December 15 Trotter Article	Section 230

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		upperclassman talked about it regularly and it was an undisputed fact that he did it. Multiple people talked about it in great detail [confirmed by another commenter] on the school's paper/website the cmcforum.com and I bet many instances of people talking about it can be seen in the comment archives from 2008-2011."		
G.	66(b)(iii)	"Rumor 3: Johnson fucked a sheep"	December 15 Trotter Article	Not a Factual Representation
H.	66(b)(iv)(1)	"Chuck had a 2002 bestiality charge expunged from his record due to his being a minor, 14 at the time."	December 15 Trotter Article	Section 230
I.	66(b)(iv)(2)	"A friend is in the San Bernadino County Sherrieff Dept. As I heard it, Chuck was about 14, had gone to stay with his cousins [for] a few weeks. . . He went for a weekend with one to a friend of the cousin's who owned a ranch near Wrightwood. The father of the friend got suspicious when they caught him coming back inside very late the first night. The next night, he apparently wandered back out & got the cops called on him by a neighbor when he was spotted attempting to copulate with his wool sheep. The neighbor took pics with a telephoto lens, which, since the cops didn't catch him mid-act, were used as the basis for his conviction. He was pants down pinning the sheep against the fence. The story is still famous in circles of San Bernadino County law enforcement, apparently. He got it expunged in 2007, saying he was just a kid experimenting, and he didn't want it to reflect badly when he was in college working for collegiate newspapers. My friend won't give interviews, because he'd get in trouble for leaking expunged records, but it definitely happened, and word	December 15 Trotter Article	Section 230

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		is that the files & pics still exist. Hope that helps!!”		
J.	81(a)(i)	“[Johnson] gets things wrong <i>a lot</i> .”	December 9 Howard Article	Opinion
K.	81(a)(ii)	“Sure enough, on the Facebook post, there are cryptic comments from friends and former classmates about some mysterious floor shitting incident.”	December 9 Howard Article	Not a Factual Representation
L.	81(b)	“Tell you what. There is some good-ass kinja to be had re: Chuck shitting on the floor one time over at Gawker.”	December 9 Howard Article	Not a Factual Representation